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8 *Attorneys for Keolis Transit America Inc.*
9 *and Kelvin Manzanares*

6 UNITED STATE DISTRICT COURT
7
8 FOR THE DISTRICT OF NEVADA

9 JOSE MENDOZA, et al.,
10
11 Plaintiffs,
12
13 v.
14 AMALGAMATED TRANSIT UNION
15 INTERNATIONAL, a nonprofit corporation,
16 et al.,
17
18 Defendants.

Case No. 2:18-cv-959-JCM-NJK

**STIPULATION TO EXTEND
DEADLINE FOR RESPONSIVE
PLEADINGS TO AMENDED
COMPLAINT (First Request)**

17 Plaintiffs, and Defendants Keolis Transit America Inc. and Kelvin Manzanares
18 (collectively the “Keolis Defendants”), by and through their undersigned counsel, hereby
19 stipulate that following discussions between the Parties and in an effort to harmonize
20 deadlines applicable to all named and served Defendants, the Parties have agreed that all
21 served Defendants shall have until September 25, 2018 to file their responsive pleadings
22 to the Amended Complaint.

23 In so doing, the Parties believe that using a common date for the filing of all
24 responsive pleadings will assist in scheduling all subsequent case management milestones
25 in the case while providing adequate time for all Defendants to prepare their responsive
26 pleadings. In addition, attorneys for Miller, Kaplan & Arase, Anne Salvador and

1 Alexandra Chernyak (jointly referred to as “MKA Defendants”) are in the process of
2 securing local counsel and will be submitting pro hac vice applications in conjunction
3 with their representation before filing any responsive pleadings for the MKA Defendants.

4 This is the first stipulation to extend the deadline for Defendants to file responsive
5 pleadings to the Amended Complaint.

6 DATED this 29th day of August, 2018.

7 **MICHAEL J. MCAVOYAMAYA, ESQ.**

8 By: /s/ Michael J. Mcavoyamaya
9 Michael J. Mcavoyamaya
10 Michael.Mcavoyamaya@gmail.com
11 Attorney for Plaintiffs

12 **CHRISTENSEN JAMES & MARTIN**

13 By: /s/ Evan James
14 Evan James, Esq.
15 elj@clmlv.com
16 Attorney for Defendants Amalgamated
17 Transit Union International, James
18 Lindsay III, Lawrence J. Hanley,
19 Antonette Bryant, Richie Murphy, Keira
20 McNett, Daniel Smith, and Tyler Home

21 **HALL, JAFFE & CLAYTON, LLP**

22 By: /s/ Riley A. Clayton
23 Riley A. Clayton, Esq.
24 rclayton@lawhjc.com
25 Attorneys for MKA Defendants

26 IT IS SO ORDERED.
Dated: August 29, 2018

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23 
24 Nancy J. Koppe
25 United States Magistrate Judge
26

**BUCHALTER,
A PROFESSIONAL CORPORATION**

By: /s/ Laurent R.G. Badoux
Laurent R.G. Badoux, Esq.
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Attorneys for Keolis Defendants